

**U.S. District Court
Southern District of Florida (Ft Lauderdale)
CIVIL DOCKET FOR CASE #: 0:12-cv-61735-WJZ**

Broward Bulldog, Inc. et al v. U.S. Department of Justice et al
Assigned to: Judge William J. Zloch
Cause: 05:0552 Freedom of Information Act

Date Filed: 09/05/2012
Jury Demand: None
Nature of Suit: 895 Freedom of Information Act
Jurisdiction: U.S. Government Defendant

Plaintiff

Broward Bulldog, Inc.
a Florida corporation not for profit

represented by **Paulo R. Lima**
Hunton & Williams
1111 Brickell Avenue
Suite 2500
Miami, FL 33131
305-810-2500
Email: plima@hunton.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Timothy John McGinn , Jr.
Gunster, Yoakley & Stewart, P.A.
Brickell World Plaza
600 Brickell Avenue
Suite 3500
Miami, FL 33131
305-376-6000
Fax: 305-376-6010
Email: tmcginn@gunster.com
ATTORNEY TO BE NOTICED

Thomas Richard Julin
Gunster, Yoakley & Stewart, P.A.
600 Brickell Avenue
Suite 3500
Miami, FL 33131
305-376-6007
Fax: 305 376-6010
Email: tjulin@gunster.com
ATTORNEY TO BE NOTICED

Plaintiff

Dan Christensen
*founder, operator and editor of the
BrowardBulldog.com website*

represented by **Paulo R. Lima**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Timothy John McGinn , Jr.
(See above for address)
ATTORNEY TO BE NOTICED

Thomas Richard Julin
(See above for address)
ATTORNEY TO BE NOTICED

V.

Defendant

represented by

U.S. Department of Justice
950 Pennsylvania Avenue, NW Washington,
DC 20530

Carole M. Fernandez
United States Attorney's Office
Federal Justice Building
99 NE 4th Street
Miami, FL 33132
305-961-9333
Fax: 305-530-7139
Email: Carole.Fernandez@usdoj.gov
TERMINATED: 04/04/2014
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Dexter Lee
United States Attorney's Office
99 NE 4 Street
Miami, FL 33132
305-961-9320
Fax: 530-7139
Email: dexter.lee@usdoj.gov
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

Federal Bureau of Investigation
935 Pennsylvania Avenue, NW Washington,
DC 20535

represented by **Carole M. Fernandez**
(See above for address)
TERMINATED: 04/04/2014
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Dexter Lee
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Amicus

Sarasota Herald Tribune (Halifax Media Holdings, LLC)

represented by **Carol Jean LoCicero**
Thomas & LoCicero PL
601 South Boulevard
Tampa, FL 33602
813-984-3060
Fax: 813-984-3070
Email: cloucicero@tlolawfirm.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Rachel Elise Fugate
Shullman Fugate PLLC
Suite 4006
2101 Vista Parkway
West Palm Beach, FL 33411
United Sta
813-935-5098
Email: rfugate@shullmanfugate.com
ATTORNEY TO BE NOTICED

Amicus

Miami Herald Media Company

represented by **Carol Jean LoCicero**
(See above for address)
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
------------	---	-------------

09/05/2012	<u>1</u>	COMPLAINT to Enforce the Freedom of Information Act against Federal Bureau of Investigation, U.S. Department of Justice. Filing fee \$ 350.00 receipt number 113C-5034481, filed by Broward Bulldog, Inc., Dan Christensen. (Attachments: # <u>1</u> Civil Cover Sheet Civil Cover Sheet, # <u>2</u> Summon(s) Federal Bureau of Investigation, # <u>3</u> Summon(s) US Department of Justice, # <u>4</u> Exhibit 1 – Articles, # <u>5</u> Exhibit 2 – Christensen Letter to the FBI, September 26, 2011, # <u>6</u> Exhibit 3 – FBI Letter to Christensen, October 6, 2011, # <u>7</u> Exhibit 4 – Christensen Letter to FBI, october 27, 2011, # <u>8</u> Exhibit 5 – FBI letter to Christensen, November 7, 2011, # <u>9</u> Exhibit 6 – Christensen letter to OIP, November 20, 2011, # <u>10</u> Exhibit 7 – FBI Letter to Christensen, December 22, 2011, # <u>11</u> Exhibit 8 – FBI Letter to Christensen, February 7, 2012, # <u>12</u> Exhibit 9 – Christensen's Appealed Letter, February 23, 2012, # <u>13</u> Exhibit 10 – OIP Letter to Christensen, May 23, 2012)(Julin, Thomas) (Entered: 09/05/2012)
09/05/2012	<u>2</u>	Judge Assignment to Judge William J. Zloch (ail) (Entered: 09/05/2012)
09/06/2012	<u>3</u>	Summons Issued as to Federal Bureau of Investigation, U.S. Department of Justice, U.S. Attorney and U.S. Attorney General (Attachments: # <u>1</u> Summon(s))(ail) (Entered: 09/06/2012)
09/19/2012	<u>4</u>	ACKNOWLEDGMENT OF SERVICE Executed as to <u>3</u> Summons Issued as to USA Department of Justice and as to Federal Bureau of Investigatgion Acknowledgment filed by Broward Bulldog, Inc., Dan Christensen. (Julin, Thomas) (Entered: 09/19/2012)
11/19/2012	<u>5</u>	MOTION to Dismiss <u>1</u> Complaint,,, by Federal Bureau of Investigation, U.S. Department of Justice. Responses due by 12/6/2012 (Fernandez, Carole) (Entered: 11/19/2012)
12/03/2012	<u>6</u>	RESPONSE in Opposition re <u>5</u> MOTION to Dismiss <u>1</u> Complaint,,, filed by Broward Bulldog, Inc., Dan Christensen. (Julin, Thomas) (Entered: 12/03/2012)
12/13/2012	<u>7</u>	REPLY to Response to Motion re <u>5</u> MOTION to Dismiss <u>1</u> Complaint,,, filed by Federal Bureau of Investigation, U.S. Department of Justice. (Fernandez, Carole) (Entered: 12/13/2012)
12/13/2012	<u>8</u>	STIPULATION of the Parties Regarding Service of the Complaint by Broward Bulldog, Inc., Dan Christensen (Julin, Thomas) (Entered: 12/13/2012)
12/19/2012	<u>9</u>	MOTION for Extension of Time for the Parties to File a Scheduling Conference Report and Proposed Scheduling Order by Federal Bureau of Investigation, U.S. Department of Justice. Responses due by 1/5/2013 (Attachments: # <u>1</u> Text of Proposed Order)(Fernandez, Carole) (Entered: 12/19/2012)
01/08/2013	<u>10</u>	ORDER of Instructions. Signed by Judge William J. Zloch on 1/8/2013. (bc) (Entered: 01/08/2013)
01/08/2013	<u>11</u>	PAPERLESS ORDER denying as moot <u>9</u> Motion for Extension of Time. Signed by Judge William J. Zloch on 1/8/2013. (bc) (Entered: 01/08/2013)
01/09/2013	<u>12</u>	Initial Disclosure(s) by Federal Bureau of Investigation, U.S. Department of Justice (Fernandez, Carole) (Entered: 01/09/2013)
01/09/2013	<u>13</u>	Initial Disclosure(s) by Broward Bulldog, Inc., Dan Christensen (Julin, Thomas) (Entered: 01/09/2013)
01/16/2013	<u>14</u>	SCHEDULING REPORT – Rule 16.1 by Broward Bulldog, Inc., Dan Christensen (Julin, Thomas) (Entered: 01/16/2013)
01/24/2013	<u>15</u>	ORDER for Pre-Trial Conference. Pretrial Conference set for 7/12/2013 at 9:30 AM in Fort Lauderdale Division before Judge William J. Zloch. Pretrial Stipulation due by Noon, 6/28/2013. Signed by Judge William J. Zloch on 1/24/2013. (bc) (Entered: 01/24/2013)
01/24/2013	<u>16</u>	ORDER REFERRING CASE to Mediation. Signed by Judge William J. Zloch on 1/24/2013. (bc) (Entered: 01/24/2013)
01/24/2013	<u>17</u>	Order on Trial Instructions. Signed by Judge William J. Zloch on 1/24/2013. (bc) (Entered: 01/24/2013)

02/07/2013	<u>18</u>	NOTICE by Broward Bulldog, Inc., Dan Christensen re <u>16</u> Order Referring Case to Mediation (Julin, Thomas) (Entered: 02/07/2013)
02/07/2013	<u>19</u>	Notice of Mediation Hearing Laurie L. Riemer added as Mediator. Mediation Hearing set for 4/29/2013 10:00 AM (ls)(See Image at DE # <u>18</u>) (Entered: 02/08/2013)
02/08/2013	<u>20</u>	Clerks Notice to Filer re <u>18</u> Notice (Other). Wrong Event Selected; ERROR – The Filer selected the wrong event. The document was re–docketed by the Clerk, see [de#19]. It is not necessary to refile this document. (ls) (Entered: 02/08/2013)
02/12/2013	<u>21</u>	Notice of Mediation Hearing before Mediator, Laurie L Riemer filed by Laurie L. Riemer. Mediation Hearing set for 4/29/2013 10:00 AM (Riemer, Laurie) (Entered: 02/12/2013)
03/14/2013	<u>22</u>	Notification of Ninety Days Expiring by Broward Bulldog, Inc., Dan Christensen re <u>5</u> MOTION to Dismiss <u>1</u> Complaint,,, filed by U.S. Department of Justice, Federal Bureau of Investigation (Julin, Thomas) (Entered: 03/14/2013)
04/01/2013	<u>23</u>	Unopposed MOTION Requesting Exemption from Mediation Requirements re <u>16</u> Order Referring Case to Mediation by Federal Bureau of Investigation, U.S. Department of Justice. (Attachments: # <u>1</u> Text of Proposed Order)(Fernandez, Carole) (Entered: 04/01/2013)
04/19/2013	<u>24</u>	ORDER granting <u>23</u> Motion requesting Exemption from Mediation Requirements. Signed by Judge William J. Zloch on 4/19/2013. (bc) (Entered: 04/19/2013)
05/13/2013	<u>25</u>	MOTION for Summary Judgment by Federal Bureau of Investigation, U.S. Department of Justice. Responses due by 5/31/2013 (Attachments: # <u>1</u> Affidavit of David M. Hardy, # <u>2</u> Exhibit A through Exhibit K to declaration of David M. Hardy)(Fernandez, Carole) (Entered: 05/13/2013)
05/31/2013	<u>26</u>	MOTION to Strike <i>Hardy Declaration or to Allow Deposition of Hardy and Memorandum of Law</i> by Broward Bulldog, Inc., Dan Christensen. Responses due by 6/17/2013 (Julin, Thomas) (Entered: 05/31/2013)
05/31/2013	<u>27</u>	MOTION for Vaughn Index and In Camera Review and Memorandum of Law by Broward Bulldog, Inc., Dan Christensen. (Julin, Thomas) (Entered: 05/31/2013)
05/31/2013	<u>28</u>	RESPONSE in Opposition re <u>25</u> MOTION for Summary Judgment filed by Broward Bulldog, Inc., Dan Christensen. (Julin, Thomas) (Entered: 05/31/2013)
05/31/2013	<u>29</u>	Statement of: Undisputed and Disputed Material Facts Relevant to Defendants' Motion for Final Summary Judgment by Broward Bulldog, Inc., Dan Christensen re <u>25</u> MOTION for Summary Judgment (Attachments: # <u>1</u> Exhibit 1 – Declaration of Patrick Gallagher, # <u>2</u> Exhibit 2 – Declaration of Larry Berberich, # <u>3</u> Exhibit 3 – Declaration of Jone Barlow Weist, # <u>4</u> Exhibit 4 – Declaration of Dan Christensen, # <u>5</u> Exhibit 5 – Declaration of Former U.S. Senator Bob Graham, # <u>6</u> Exhibit A – To Declaration of Former U.S. Senator Bob Graham, # <u>7</u> Exhibit B (Part 1 of 3) – To Declaration of Former U.S. Senator Bob Graham, # <u>8</u> Exhibit B (Part 2 of 3) – To Declaration of Former U.S. Senator Bob Graham, # <u>9</u> Exhibit B (Part 3 of 3) – To Declaration of Former U.S. Senator Bob Graham)(Julin, Thomas) (Entered: 05/31/2013)
06/10/2013	<u>30</u>	REPLY to Response to Motion re <u>25</u> MOTION for Summary Judgment filed by Federal Bureau of Investigation, U.S. Department of Justice. (Fernandez, Carole) (Entered: 06/10/2013)
06/17/2013	<u>31</u>	RESPONSE in Opposition re <u>26</u> MOTION to Strike <i>Hardy Declaration or to Allow Deposition of Hardy and Memorandum of Law</i> filed by Federal Bureau of Investigation, U.S. Department of Justice. (Fernandez, Carole) (Entered: 06/17/2013)
06/17/2013	<u>32</u>	RESPONSE in Opposition re <u>27</u> MOTION for Vaughn Index and In Camera Review and Memorandum of Law filed by Federal Bureau of Investigation, U.S. Department of Justice. (Fernandez, Carole) (Entered: 06/17/2013)
06/19/2013	<u>33</u>	MOTION for Protective Order by Federal Bureau of Investigation, U.S. Department of Justice. (Attachments: # <u>1</u> Interrogatories, # <u>2</u> Request for Production, # <u>3</u> Text of Proposed Order)(Fernandez, Carole) (Entered: 06/19/2013)

06/26/2013	<u>34</u>	PRETRIAL STIPULATION <i>BY ALL PARTIES</i> by Broward Bulldog, Inc., Dan Christensen (Attachments: # <u>1</u> Exhibit Schedule A – Plaintiffs' Numbered List of Trial Exhibits & Objections, # <u>2</u> Exhibit Schedule B – Defendants' Numbered List of Trial Exhibits & Objections)(Julin, Thomas) (Entered: 06/26/2013)
06/27/2013	<u>35</u>	REPLY to Response to Motion re <u>26</u> MOTION to Strike <i>Hardy Declaration or to Allow Deposition of Hardy and Memorandum of Law</i> filed by Broward Bulldog, Inc., Dan Christensen. (Julin, Thomas) (Entered: 06/27/2013)
06/27/2013	<u>36</u>	REPLY to Response to Motion re <u>27</u> MOTION for Vaughn Index and In Camera Review and Memorandum of Law filed by Broward Bulldog, Inc., Dan Christensen. (Julin, Thomas) (Entered: 06/27/2013)
06/27/2013	<u>37</u>	NOTICE by Broward Bulldog, Inc., Dan Christensen re <u>29</u> Statement,,, of <i>Correction of Typographical Error</i> (Julin, Thomas) (Entered: 06/27/2013)
06/28/2013	<u>38</u>	ORDER denying <u>5</u> Motion to Dismiss. Signed by Judge William J. Zloch on 6/28/2013. (bc) (Entered: 06/28/2013)
07/06/2013	<u>39</u>	RESPONSE in Opposition re <u>33</u> MOTION for Protective Order filed by Broward Bulldog, Inc., Dan Christensen. (Attachments: # <u>1</u> Exhibit Statement of Glenn A. Fine)(Julin, Thomas) (Entered: 07/06/2013)
07/11/2013	<u>40</u>	MOTION for Extension of Time to File Answer RE: Complaints re <u>1</u> Complaint,,, by Federal Bureau of Investigation, U.S. Department of Justice. (Attachments: # <u>1</u> Text of Proposed Order)(Fernandez, Carole) (Entered: 07/11/2013)
07/11/2013	<u>41</u>	Proposed Findings of Fact and Proposed Conclusions of Law by Federal Bureau of Investigation, U.S. Department of Justice. (Fernandez, Carole) (Entered: 07/11/2013)
07/11/2013	<u>42</u>	Proposed Findings of Fact and Proposed Conclusions of Law by Broward Bulldog, Inc., Dan Christensen. (Julin, Thomas) (Entered: 07/11/2013)
07/12/2013	<u>43</u>	Minute Entry for proceedings held before Judge William J. Zloch: Final Pretrial Conference held on 7/12/2013. Court Reporter: Carl Schanzleh, 954-769-5488 / Carl_Schanzleh@flsd.uscourts.gov (bc) (Entered: 07/12/2013)
07/16/2013	<u>44</u>	ORDER granting <u>40</u> Motion for Extension of Time to Answer. Defendants shall file their response to Plaintiffs' Complaint 14 days after Court's ruling on Defendants' Motion for Summary Judgement. Signed by Judge William J. Zloch on 7/16/2013. (bc) (Entered: 07/16/2013)
07/16/2013	<u>45</u>	ORDER directing Plaintiffs to file Motion re: FOIA request by Noon, 7/19/2013; Defendants shall file its responses by Noon, 8/7/2013 and Plaintiffs shall file their Reply by Noon, 8/14/2013. Signed by Judge William J. Zloch on 7/16/2013. (bc) (Entered: 07/16/2013)
07/19/2013	<u>46</u>	Plaintiff's MOTION to Compel <i>Additional Search</i> by Broward Bulldog, Inc., Dan Christensen. Responses due by 8/5/2013 (Julin, Thomas) (Entered: 07/19/2013)
08/07/2013	<u>47</u>	RESPONSE in Opposition re <u>46</u> Plaintiff's MOTION to Compel <i>Additional Search</i> filed by Federal Bureau of Investigation, U.S. Department of Justice. (Fernandez, Carole) (Entered: 08/07/2013)
08/14/2013	<u>48</u>	RESPONSE/REPLY to Response to Motion for <i>Additional Search</i> by Broward Bulldog, Inc., Dan Christensen. (Julin, Thomas) (Entered: 08/14/2013)
08/14/2013	<u>49</u>	REPLY to Response to Motion re <u>46</u> Plaintiff's MOTION to Compel <i>Additional Search Corrected</i> filed by Broward Bulldog, Inc., Dan Christensen. (Julin, Thomas) (Entered: 08/14/2013)
09/10/2013	<u>50</u>	MOTION for Leave to File <i>Amicus Curiae Brief and Supporting Memorandum of Law</i> by Sarasota Herald Tribune (Halifax Media Holdings, LLC). Attorney Rachel Elise Fugate added to party Sarasota Herald Tribune (Halifax Media Holdings, LLC)(pty:am). (Attachments: # <u>1</u> Exhibit Exhibit)(Fugate, Rachel) (Entered: 09/10/2013)
09/19/2013	<u>51</u>	RESPONSE in Opposition re <u>50</u> MOTION for Leave to File <i>Amicus Curiae Brief and Supporting Memorandum of Law</i> filed by Federal Bureau of Investigation, U.S. Department of Justice. (Fernandez, Carole) (Entered: 09/19/2013)

09/27/2013	<u>52</u>	MOTION for Leave to File <i>Amicus Curiae Brief and Supporting Memorandum of Law</i> by Miami Herald Media Company. Attorney Carol Jean LoCicero added to party Miami Herald Media Company(pty:am). (Attachments: # <u>1</u> Exhibit 9/11's Lingering Questions)(LoCicero, Carol) (Entered: 09/27/2013)
10/09/2013	<u>53</u>	RESPONSE in Opposition re <u>52</u> MOTION for Leave to File <i>Amicus Curiae Brief and Supporting Memorandum of Law</i> filed by Federal Bureau of Investigation, U.S. Department of Justice. (Fernandez, Carole) (Entered: 10/09/2013)
12/02/2013	<u>54</u>	NOTICE of Attorney Appearance by Dexter Lee on behalf of Federal Bureau of Investigation, U.S. Department of Justice. Attorney Dexter Lee added to party Federal Bureau of Investigation(pty:dft), Attorney Dexter Lee added to party U.S. Department of Justice(pty:dft). (Lee, Dexter) (Entered: 12/02/2013)
03/19/2014	<u>55</u>	ORDER granting <u>50</u> Motion for Leave to File. <i>Clerks Notice: Filer must separately re-file the amended pleading pursuant to Local Rule 15.1, unless otherwise ordered by the Judge.</i> The Sarasota Herald Tribune and The Miami Herald have by noon 3/25/2014 to file their Amicus Curiae Briefs Signed by Judge William J. Zloch on 3/19/2014. (ots) (Entered: 03/19/2014)
03/20/2014	<u>56</u>	Defendant's MOTION Request to Remove Counsel by Federal Bureau of Investigation, U.S. Department of Justice. (Lee, Dexter) (Entered: 03/20/2014)
03/25/2014	<u>57</u>	RESPONSE in Opposition re <u>25</u> MOTION for Summary Judgment by <i>Amicus Curiae</i> filed by Miami Herald Media Company, Sarasota Herald Tribune (Halifax Media Holdings, LLC). Attorney Carol Jean LoCicero added to party Sarasota Herald Tribune (Halifax Media Holdings, LLC)(pty:am). (LoCicero, Carol) (Entered: 03/25/2014)
03/31/2014	<u>58</u>	ORDER granting <u>46</u> Motion to Compel; denying <u>25</u> Motion for Summary Judgment; denying <u>26</u> Motion to Strike ; denying <u>27</u> Motion for Vaughn Index and In Camera Review; and granting <u>33</u> Motion for Protective Order. Signed by Judge William J. Zloch on 3/31/2014. (bc) (Entered: 03/31/2014)
04/04/2014	<u>59</u>	ORDER granting <u>56</u> Motion to Remove Counsel. Signed by Judge William J. Zloch on 4/4/2014. (bc) (Entered: 04/04/2014)
04/04/2014		Attorney Carole M. Fernandez terminated. (bc) (Entered: 04/04/2014)
04/04/2014	<u>60</u>	ORDER re <u>46</u> Plaintiff's Motion to Compel Additional Search. Defendants' Report to Court and Declarations due by Noon, Friday, 6/6/2014. Signed by Judge William J. Zloch on 4/4/2014. (bc) (Entered: 04/04/2014)
04/17/2014	<u>61</u>	Defendant's MOTION for Extension of Time to Make In Camera Submission re <u>60</u> Order, Set/Reset Deadlines (Responses due by 5/5/2014), Defendant's MOTION for Reconsideration re <u>60</u> Order, Set/Reset Deadlines by Federal Bureau of Investigation, U.S. Department of Justice. (Attachments: # <u>1</u> Exhibit A – Second Declaration of David M. Hardy)(Lee, Dexter) (Entered: 04/17/2014)
04/17/2014	<u>62</u>	NOTICE by Federal Bureau of Investigation, U.S. Department of Justice re <u>61</u> Defendant's MOTION for Extension of Time to Make In Camera Submission re <u>60</u> Order, Set/Reset DeadlinesDefendant's MOTION for Reconsideration re <u>60</u> Order, Set/Reset Deadlines <i>Regarding Certificate of Conference on Motion for Enlargement of Time to Make In Camera Submission and for Partial Reconsideration</i> (Lee, Dexter) (Entered: 04/17/2014)
04/18/2014	<u>63</u>	ORDER granting <u>61</u> Motion for Extension of Time; denying <u>61</u> Motion for Reconsideration. See Order for details. Signed by Judge William J. Zloch on 04/18/2014. (wjz3) (Main Document 63 replaced on 4/18/2014) (mb). (Entered: 04/18/2014)
04/18/2014	64	Clerks Notice of Docket Correction re <u>63</u> Order on Motion for Extension of Time, Order on Motion for Reconsideration. Correction Document replaced due to scanning error. (mb) (Entered: 04/18/2014)
04/18/2014	<u>65</u>	NOTICE of Attorney Appearance by Paulo R. Lima on behalf of Broward Bulldog, Inc., Dan Christensen. Attorney Paulo R. Lima added to party Broward Bulldog, Inc.(pty:pla), Attorney Paulo R. Lima added to party Dan Christensen(pty:pla). (Lima, Paulo) (Entered: 04/18/2014)

04/18/2014	<u>66</u>	NOTICE by Federal Bureau of Investigation, U.S. Department of Justice <i>of In Camera Filing</i> (Lee, Dexter) (Entered: 04/18/2014)
05/01/2014	<u>67</u>	NOTICE by Federal Bureau of Investigation, U.S. Department of Justice <i>of In Camera Filing</i> (Lee, Dexter) (Entered: 05/01/2014)
05/09/2014	<u>68</u>	NOTICE by Federal Bureau of Investigation, U.S. Department of Justice <i>of Filing Third Declaration of David M. Hardy</i> (Attachments: # <u>1</u> Exhibit 1 – Third Declaration of David M. Hardy)(Lee, Dexter) (Entered: 05/09/2014)
06/06/2014	<u>69</u>	NOTICE by Federal Bureau of Investigation, U.S. Department of Justice <i>of Filing Fourth Declaration of David M. Hardy</i> (Attachments: # <u>1</u> Exhibit 1 – Fourth Declaration of David M. Hardy)(Lee, Dexter) (Entered: 06/06/2014)
06/06/2014	<u>70</u>	NOTICE by Federal Bureau of Investigation, U.S. Department of Justice <i>of Filing Fifth Declaration of David M. Hardy, Ex Parte, for In Camera Review</i> (Lee, Dexter) (Entered: 06/06/2014)
06/27/2014	<u>71</u>	NOTICE by Federal Bureau of Investigation, U.S. Department of Justice <i>of In Camera Filing</i> (Lee, Dexter) (Entered: 06/27/2014)
06/30/2014	<u>72</u>	NOTICE by Federal Bureau of Investigation, U.S. Department of Justice <i>of Filing Material Released on June 27, 2014</i> (Attachments: # <u>1</u> Exhibit A – Material Released to Plaintiff on June 27, 2014)(Lee, Dexter) (Entered: 06/30/2014)
04/23/2015	<u>73</u>	MOTION Request for Status Conference by Broward Bulldog, Inc., Dan Christensen. (Attachments: # <u>1</u> Exhibit 1. The FBI Protecting the Homeland in the 21st Century, March 25, 2015, # <u>2</u> Exhibit 2. Editorial: FBI's Suspicious Behavior, March 29, 2015, # <u>3</u> Exhibit 3. FBI: Leads on Sarasota Family Not Substantiated, April 10, 2015, # <u>4</u> Exhibit 4. How the FBI is Whitewashing the Saudi Connection to 9/11, April 12, 2015, # <u>5</u> Exhibit 5. 9/11 Review Commission Under the FBI's Thumb, April 13, 2015, # <u>6</u> Exhibit 6. Florida Ex-Senator Pursues Claims of Saudi Ties to Sept. 11 Attacks, April 13, 2015, # <u>7</u> Exhibit 7. Column: 9/11 Claim is Unfounded, April 16, 2015, # <u>8</u> Exhibit 8. Column: Did 9/11 Terrorists Get Outside Help, April 17, 2015, # <u>9</u> Exhibit 9. Email from Thomas Julin to Dexter Lee, April 3, 2015, # <u>10</u> Exhibit 10. Email from Dexter Lee to Thomas Julin, April 9, 2015)(Julin, Thomas) (Entered: 04/23/2015)
05/11/2015	<u>74</u>	RESPONSE in Opposition re <u>73</u> MOTION Request for Status Conference filed by Federal Bureau of Investigation, U.S. Department of Justice. Replies due by 5/21/2015. (Lee, Dexter) (Entered: 05/11/2015)
11/25/2015	<u>75</u>	NOTICE by Federal Bureau of Investigation, U.S. Department of Justice <i>of In Camera Filing</i> (Lee, Dexter) (Entered: 11/25/2015)
03/22/2016	<u>76</u>	PAPERLESS ORDER denying <u>73</u> Motion For Status Conference. A Status Conference, if necessary in the future, will be set by separate Order of the Court. Signed by Judge William J. Zloch on 3/22/2016. (wjz3) (Entered: 03/22/2016)
05/31/2016	<u>77</u>	Interim MOTION for Attorney Fees by Broward Bulldog, Inc., Dan Christensen. Responses due by 6/17/2016 (Attachments: # <u>1</u> Affidavit Thomas R. Julin)(Julin, Thomas) (Entered: 05/31/2016)
06/02/2016	<u>78</u>	NOTICE by Federal Bureau of Investigation, U.S. Department of Justice <i>of In Camera Filing</i> (Lee, Dexter) (Entered: 06/02/2016)
06/17/2016	<u>79</u>	Unopposed MOTION for Extension of Time to File Response/Reply/Answer as to <u>77</u> Interim MOTION for Attorney Fees by Federal Bureau of Investigation, U.S. Department of Justice. (Attachments: # <u>1</u> Text of Proposed Order)(Lee, Dexter) (Entered: 06/17/2016)
06/17/2016	<u>80</u>	PAPERLESS ORDER granting <u>79</u> Motion for Extension of Time to File. Defendants have until noon on Friday, July 1, 2016, to file their response. Signed by Judge William J. Zloch on 6/17/2016. (wjz1) (Entered: 06/17/2016)
07/01/2016	<u>81</u>	RESPONSE in Opposition re <u>77</u> Interim MOTION for Attorney Fees filed by Federal Bureau of Investigation, U.S. Department of Justice. Replies due by 7/11/2016. (Lee, Dexter) (Entered: 07/01/2016)
07/11/2016	<u>82</u>	NOTICE of Change of Address by Thomas Richard Julin (Julin, Thomas) (Entered: 07/11/2016)

07/11/2016	<u>83</u>	Agreed Motion for Extension of Time to File Response/Reply/Answer as to <u>77</u> Interim MOTION for Attorney Fees by Broward Bulldog, Inc., Dan Christensen. Responses due by 7/28/2016 (Julin, Thomas) Modified Relief/Link on 7/12/2016 (ls). (Entered: 07/11/2016)
07/12/2016	<u>84</u>	Clerks Notice to Filer re <u>83</u> Agreed MOTION for Extension of Time to Fole Reply to Response to Plaintiffs' Motion for Interim Attorneys' Fee Award re <u>81</u> Response in Opposition to Motion. Wrong Motion Relief(s) Selected; ERROR – The Filer selected the wrong motion relief(s) when docketing the motion. The correction was made by the Clerk. It is not necessary to refile this document but future motions filed must include applicable reliefs. (ls) (Entered: 07/12/2016)
07/12/2016	<u>85</u>	PAPERLESS ORDER granting <u>83</u> Motion for Extension of Time to File. Plaintiffs have until noon on Monday, July 18, 2016, to file their reply. Signed by Judge William J. Zloch on 7/12/2016. (wjz1) (Entered: 07/12/2016)
07/12/2016		Reset Deadlines as to <u>77</u> Interim MOTION for Attorney Fees . Replies due by 7/28/2016. (ls) (per DE #85) (Entered: 07/13/2016)
07/17/2016	<u>86</u>	REPLY to Response to Motion re <u>77</u> Interim MOTION for Attorney Fees filed by Broward Bulldog, Inc., Dan Christensen. (Julin, Thomas) (Entered: 07/17/2016)
08/08/2016	<u>87</u>	NOTICE by Broward Bulldog, Inc., Dan Christensen <i>of Declassification of Records that May be Relevant to the Court's In Camera Review of Classified FBI Records</i> (Attachments: # <u>1</u> Exhibit 07–15–2015 Statement of Director of National Intelligence, # <u>2</u> Exhibit The 28 Pages – Part 4 of Joint Congressional Inquiry, # <u>3</u> Exhibit 09–01–2005 CIA–FBI Memorandum) (Julin, Thomas) (Entered: 08/08/2016)
03/30/2017	<u>88</u>	ORDER denying <u>77</u> Motion for Attorney Fees. Signed by Senior Judge William J. Zloch on 3/30/2017. (bc) (Entered: 03/30/2017)
05/16/2017	<u>89</u>	NOTICE by Federal Bureau of Investigation, U.S. Department of Justice <i>of In Camera Filing</i> (Lee, Dexter) (Entered: 05/16/2017)
06/14/2017	<u>90</u>	NOTICE by Federal Bureau of Investigation, U.S. Department of Justice <i>of In Camera Filing</i> (Lee, Dexter) (Entered: 06/14/2017)
10/02/2017	<u>91</u>	ORDER Setting Status Conference: Status Conference set for 10/26/2017 at 10:30 AM in Fort Lauderdale Division before Senior Judge William J. Zloch. Signed by Senior Judge William J. Zloch on 10/2/2017. (bc) (Entered: 10/02/2017)
10/03/2017	<u>92</u>	Unopposed Motion to Continue/Reschedule Status Conference by Broward Bulldog, Inc., Dan Christensen. (Attachments: # <u>1</u> Text of Proposed Order)(Julin, Thomas) Modified Relief on 10/4/2017 (ls). (Entered: 10/03/2017)
10/04/2017	<u>93</u>	Clerks Notice to Filer re <u>92</u> Agreed MOTION to Reschedule Status Conference re <u>91</u> Order Setting Status Conference . Wrong Motion Relief(s) Selected; ERROR – The Filer selected the wrong motion relief(s) when docketing the motion. The correction was made by the Clerk. It is not necessary to refile this document but future motions filed must include applicable reliefs. (ls) (Entered: 10/04/2017)
10/16/2017	<u>94</u>	ORDER terminating <u>92</u> Motion to Continue. Motions due by 11/27/2017. Responses due by 1/11/2018 Replies due by 1/25/2018. Signed by Senior Judge William J. Zloch on 10/13/2017. (vmz) (Entered: 10/16/2017)
10/17/2017	<u>95</u>	NOTICE of Attorney Appearance by Timothy John McGinn, Jr on behalf of Broward Bulldog, Inc., Dan Christensen. Attorney Timothy John McGinn, Jr added to party Broward Bulldog, Inc.(pty:pla), Attorney Timothy John McGinn, Jr added to party Dan Christensen(pty:pla). (McGinn, Timothy) (Entered: 10/17/2017)
11/27/2017	<u>96</u>	Renewed MOTION for Summary Judgment by Federal Bureau of Investigation, U.S. Department of Justice. Responses due by 12/11/2017 (Lee, Dexter) (Entered: 11/27/2017)
11/27/2017	<u>97</u>	Statement of: <i>Uncontroverted Material Facts in Support of Defendants' Renewed Motion for Summary Judgment</i> by Federal Bureau of Investigation, U.S. Department of Justice re <u>96</u> Renewed MOTION for Summary Judgment (Attachments: # <u>1</u> Exhibit 1 – Fifth Declaration of David M. Hardy, # <u>2</u> Exhibit A(Fifth Hardy Decl.) – Updated Universe of Documents Released to Plts (Redacted), # <u>3</u> Exhibit B(Fifth Hardy Decl.) – Index Explaining The Location of Responsive Records (Redacted), # <u>4</u> Exhibit C(Fifth Hardy

		Decl.) – Declaration of Michael G. Seidel, # <u>5</u> Exhibit 2 – Appendix for Numbered Redactions)(Lee, Dexter) (Entered: 11/27/2017)
11/27/2017	<u>98</u>	NOTICE by Federal Bureau of Investigation, U.S. Department of Justice re <u>96</u> Renewed MOTION for Summary Judgment of <i>In Camera Filing</i> (Lee, Dexter) (Entered: 11/27/2017)
01/11/2018	<u>99</u>	Plaintiff's RESPONSE to <u>97</u> Statement,, of <i>Uncontroverted Material Facts</i> by Broward Bulldog, Inc., Dan Christensen. (Attachments: # <u>1</u> Affidavit Thomas R. Julin)(Julin, Thomas) (Entered: 01/11/2018)
01/11/2018	<u>100</u>	RESPONSE in Opposition re <u>96</u> Renewed MOTION for Summary Judgment filed by Broward Bulldog, Inc., Dan Christensen. Replies due by 1/18/2018. (Attachments: # <u>1</u> Exhibit FBI Memo re Interview of Wissam Taysir Hammoud re Abdulaziz al-Hijji, # <u>2</u> Exhibit Florida Department of Law Enforcement Interview of Wissam Taysir Hammoud re Abdulaziz al-Hijji)(Julin, Thomas) (Entered: 01/11/2018)
01/11/2018	<u>101</u>	Plaintiff's MOTION for Discovery and to Modify Protective Order by Broward Bulldog, Inc., Dan Christensen. Responses due by 1/25/2018 (Julin, Thomas) (Entered: 01/11/2018)
01/25/2018	<u>102</u>	REPLY to Response to Motion re <u>96</u> Renewed MOTION for Summary Judgment filed by Federal Bureau of Investigation, U.S. Department of Justice. (Lee, Dexter) (Entered: 01/25/2018)
01/25/2018	<u>103</u>	RESPONSE in Opposition re <u>101</u> Plaintiff's MOTION for Discovery and to Modify Protective Order filed by Federal Bureau of Investigation, U.S. Department of Justice. Replies due by 2/1/2018. (Lee, Dexter) (Entered: 01/25/2018)
02/01/2018	<u>104</u>	REPLY to Response to Motion re <u>101</u> Plaintiff's MOTION for Discovery and to Modify Protective Order filed by Broward Bulldog, Inc., Dan Christensen. (McGinn, Timothy) (Entered: 02/01/2018)
05/08/2018	<u>105</u>	Notification of Ninety Days Expiring by Broward Bulldog, Inc., Dan Christensen re <u>101</u> Plaintiff's MOTION for Discovery and to Modify Protective Order filed by Dan Christensen, Broward Bulldog, Inc. (Julin, Thomas) (Entered: 05/08/2018)
08/15/2018	<u>106</u>	Defendant's MOTION for Leave to File <i>Answer to Plaintiffs' Complaint</i> by Federal Bureau of Investigation, U.S. Department of Justice. (Attachments: # <u>1</u> Text of Proposed Order)(Lee, Dexter) (Entered: 08/15/2018)
08/17/2018	<u>107</u>	Notification of Ninety Days Expiring by Federal Bureau of Investigation, U.S. Department of Justice (Lee, Dexter) (Entered: 08/17/2018)
09/26/2018	<u>108</u>	Notice of Supplemental Authority re <u>100</u> Response in Opposition to Motion, by Broward Bulldog, Inc., Dan Christensen (Julin, Thomas) (Entered: 09/26/2018)
12/17/2018	<u>109</u>	Plaintiff's MOTION for Hearing (<i>Status Conference</i>) by Broward Bulldog, Inc., Dan Christensen. (Attachments: # <u>1</u> Exhibit Senate Joint Resolution 69 (Khashoggi), # <u>2</u> Exhibit Senate Joint Resolution 54 (Yemen War), # <u>3</u> Exhibit Congressional Record 12–13–2018 (re SJR 59 & 64))(Julin, Thomas) (Entered: 12/17/2018)
12/31/2018	<u>110</u>	RESPONSE in Opposition re <u>109</u> Plaintiff's MOTION for Hearing (<i>Status Conference</i>) filed by Federal Bureau of Investigation, U.S. Department of Justice. Replies due by 1/7/2019. (Lee, Dexter) (Entered: 12/31/2018)
07/08/2019	<u>111</u>	ORDER that, by noon on Thursday, July 11, 2019, both Parties shall individually provide the Court with the information requested herein, and the Parties shall confer and provide the Court with a joint statement, as described herein. Signed by Senior Judge William J. Zloch on 7/8/2019. <i>See attached document for full details.</i> (bc) (Entered: 07/08/2019)
07/10/2019	<u>112</u>	REPORT REGARDING Plaintiffs' Citations to Record Materials Supporting Declaration of Thomas R. Julin by Broward Bulldog, Inc., Dan Christensen (Attachments: # <u>1</u> Exhibit 01–27–2017 FBI Release on Identifying Agent Jacqueline Maguire, # <u>2</u> Exhibit 02–27–2017 Court Order, # <u>3</u> Exhibit 03–14–2017 Fourth Declaration of David M. Hardy, # <u>4</u> Exhibit 03–15–2017 FBI Annotated Re-release of 04–30–2014 FBI Memo, # <u>5</u> Exhibit 04–2016 2002 "Many Connections" Memo, # <u>6</u> Exhibit 09–15–2011 White Paper Version 1, # <u>7</u> Exhibit 09–15–2011 White Paper Version 2, # <u>8</u> Exhibit

		03-13-2017 FBI Email re Document Destruction, # <u>2</u> Exhibit 04-07-2004 FBI Interview of Wissam Hammoud, # <u>10</u> Exhibit 04-07-2004 FDLE Report of FBI Interview of Wissam Hammoud, # <u>11</u> Exhibit 05-16-2017 Court Order)(Julin, Thomas) (Entered: 07/10/2019)
07/10/2019	<u>113</u>	Defendant's RESPONSE to <u>111</u> Order,, Set/Reset Deadlines, <i>to July 8, 2019 Order</i> by Federal Bureau of Investigation, U.S. Department of Justice. (Attachments: # <u>1</u> Exhibit A – Court's Feb. 27, 2017 Order, Case No. 16-61289, # <u>2</u> Exhibit B – Fourth Declaration of David M. Hardy (DE 66-1, Case No. 16-61289, # <u>3</u> Exhibit C – Fifth Declaration of David M. Hardy (DE 66-1, Case No. 16-61289))(Lee, Dexter) (Entered: 07/10/2019)
08/22/2019	<u>114</u>	ORDER granting in part <u>96</u> Renewed Motion for Summary Judgment; denying <u>101</u> Plaintiffs Motion To Modify Protective Order To Allow Discovery Prior To Ruling On Defendants Motion For Summary Judgment; granting <u>106</u> Defendants Motion For Leave Of Court To File Answer To Plaintiffs Complaint, and Defendants must file any Answer no later than noon on Friday, September 6, 2019 ; denying as moot <u>109</u> Motion for Hearing. Signed by Senior Judge William J. Zloch on 8/22/2019. <i>See attached document for full details.</i> (bc) (Entered: 08/22/2019)
08/22/2019		Set/Reset Answer Due Deadline: Federal Bureau of Investigation response due 9/6/2019; U.S. Department of Justice response due 9/6/2019. (bc) (Entered: 08/22/2019)